## **GLASS HARLOW & HOGROGIAN LLP**

## ATTORNEYS AND COUNSELORS AT LAW

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Bryan D. Glass
Partner

January 28, 2022

Via ECF
Honorable Kiyo A. Matsumoto
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Elizabeth "Betsy" Combier v. Francesco Portelos, et al., 17-CV-2239 (KAM) (RLM)

## Dear Judge Matsumoto:

I am submitting this letter on behalf of Defendants Jordan F. Harlow and myself in opposition to Defendant and Counter Claimant Lucio Celli's pre-motion letter. We agree with City Defendants' position that this matter has been dismissed and closed since October 9, 2019, and we respectfully request that the Court deny Mr. Celli's application, in so far as any conference would involve our participation, and instead terminate this action finally and in its entirety.

Thank you for your consideration.

Respectfully submitted,

Is: Bryan D. Glass

Bryan D. Glass, Esq. Attorney for Plaintiff

c: Via ECF all counsel of record

c: Via U.S. Mail Elizabeth Betsy Combier Plaintiff, Counter Defendant, pro se 315 East 65th Street, Apt 4C New York, New York 10065

Francesco Portelos Defendant, pro se 52 Wiman Place Staten Island, New York 10305

Lucio Celli Defendant, Counter Claimant, pro se 2743 Seymour Avenue Bronx, New York 10469